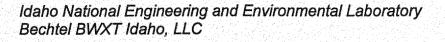
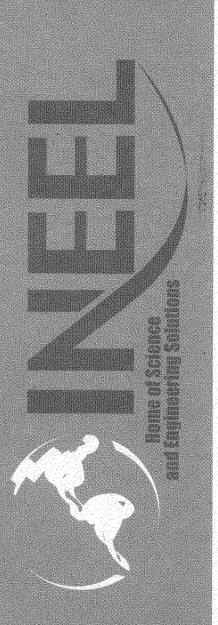


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In Situ Bioremediation Remedial Action Groundwater Monitoring Plan for Test Area North, Operable Unit 1-07B

January 2003

Idaho National Engineering and Environmental Laboratory Environmental Restoration Program Idaho Falls, Idaho 83415

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Assistant Secretary for Environmental Management
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ABSTRACT

This groundwater monitoring plan (GWMP) supports the Operable Unit (OU) 1-07B In Situ Bioremediation Remedial Action Work Plan for implementing the final remedy for the OU 1-07B hotspot. The final hotspot remedy includes installing and operating an electron donor injection facility (consisting of a new injection well, injection equipment, onsite laboratory capabilities, and ancillary equipment), constructing two new groundwater monitoring wells, and monitoring groundwater at 14 existing locations and the two new monitoring wells. The hotspot remedy will be implemented in four phases: 1) interim operations, 2) initial operations, 3) optimization operations, and 4) long-term operations. These phases begin and end based upon conditions observed in the groundwater. As a result, remedy performance and compliance with remedial action objectives will be monitored under this plan throughout all implementation phases. This plan documents the procedures and rationale for groundwater monitoring to be conducted during each of the four phases. Data collected under this GWMP will be used to assess progress of the remedy, determine the need for operational changes, and support agency periodic performance reviews.



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ACRONYMS

COC chain of custody

DQO data quality objective

EPA Environmental Protection Agency

FFA/CO Federal Facility Agreement and Consent Order

FLL Field Lab Lead

FTL field team leader

GWMP Groundwater Monitoring Plan

HASP Health and Safety Plan

ID identification

INEEL Idaho National Engineering and Environmental Laboratory

IRC INEEL Research Center

ISB in situ bioremediation

MCL maximum contaminant level

O&M operations and maintenance

OU operable unit

PCE tetrachloroethene

PE performance evaluation

QA quality assurance

QAPjP Quality Assurance Project Plan

RA remedial action

RAO remedial action objective

RAWP Remedial Action Work Plan

SAP Sampling and Analysis Plan

SMO Sample Management Office

TAN Test Area North

TBD to be determined

TCE trichloroethene

TOS Task Order Statement

TPR technical procedure

TSF Technical Support Facility

VOC volatile organic compound

In Situ Bioremediation Remedial Action Groundwater Monitoring Plan for Test Area North, Operable Unit 1-07B

1. INTRODUCTION

This groundwater monitoring plan (GWMP) supports the Operable Unit (OU) 1-07B In Situ Bioremediation (ISB) Remedial Action Work Plan (RAWP) for implementing the final remedy, as identified in the *Record of Decision Amendment for the Technical Support Facility Injection Well (TSF-05) and Surrounding Groundwater Contamination (TSF-23) and Miscellaneous No Action Sites Final Remedial Action* (DOE-ID 2001). The remedy entails installation and operation of an ISB lactate injection facility and two new monitoring wells. The injection facility consists of a new injection well, injection equipment, and onsite laboratory capabilities. The two new monitoring wells, PMW-1 and PMW-2, shall be located to provide crossgradient monitoring capabilities in the vicinity of Test Area North (TAN)-28 and TAN-30A. Data collected in accordance with this GWMP will be used to assess progress of the remedy, determine the need for operational changes, and support agency periodic performance reviews.

This document has been reviewed in accordance with governing Federal Facility Agreement and Consent Order (FFA/CO) requirements for primary documents. Appendix A contains agency comments and the comment resolutions from the agency review of the ISB GWMP (Draft) version of the document. Appendix B contains comments and comment resolutions from the agency review of the ISB GWMP (Draft Final) version.

Implementation of the OU 1-07B final remedy is defined in the *In Situ Bioremediation Remedial Action Work Plan for Test Area North Final Groundwater Remediation, Operable Unit 1-07B(Draft)* (DOE-ID 2002a). The ISB component of the remedy will be implemented in four phases (see Figure 1-1), as follows:

- <u>Interim operations</u>: This phase is a continuation of pre-design operational activities, including lactate injection and performance monitoring. It will also implement activities to evaluate alternate electron donors, develop injection monitoring strategies that will support initial operations, and refine the ISB simulation model. Interim operations will end when construction of the remedy is complete.
- <u>Initial operations</u>: This phase of remedy implementation will begin when construction is complete, and will focus on distributing electron donor adequately throughout the residual source area and cutting off downgradient contaminant flux of volatile organic compounds (VOCs) from the hotspot. Initial operations will be complete when VOC concentrations at TAN-28 and -30A (shown in the map of monitoring well locations in Figure 1-2) are below maximum contaminant levels (MCLs).
- <u>Optimization operations</u>: This phase will focus on maintaining adequate electron donor distribution to remediate the aquifer in the vicinity of the hotspot to risk-based levels, and cutting off crossgradient flux of VOCs from the hotspot. This phase of operations will be complete when VOC concentrations at PMW-1 and PMW-2 are below MCLs.
- <u>Long-term operations</u>: This phase will begin when electron donor is distributed throughout the residual source area. Continued ethene production will also be observed throughout this phase. This phase of operations will be complete when ethene production has ceased and VOC concentrations are below risk-based levels throughout the hotspot area.

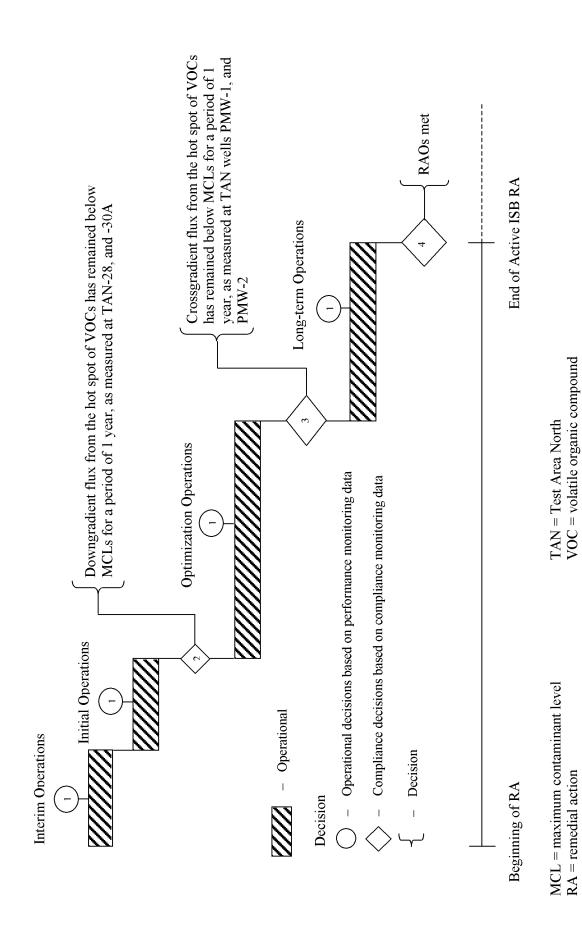


Figure 1-1. Remedial action implementation sequence.

RAO = remedial action objective

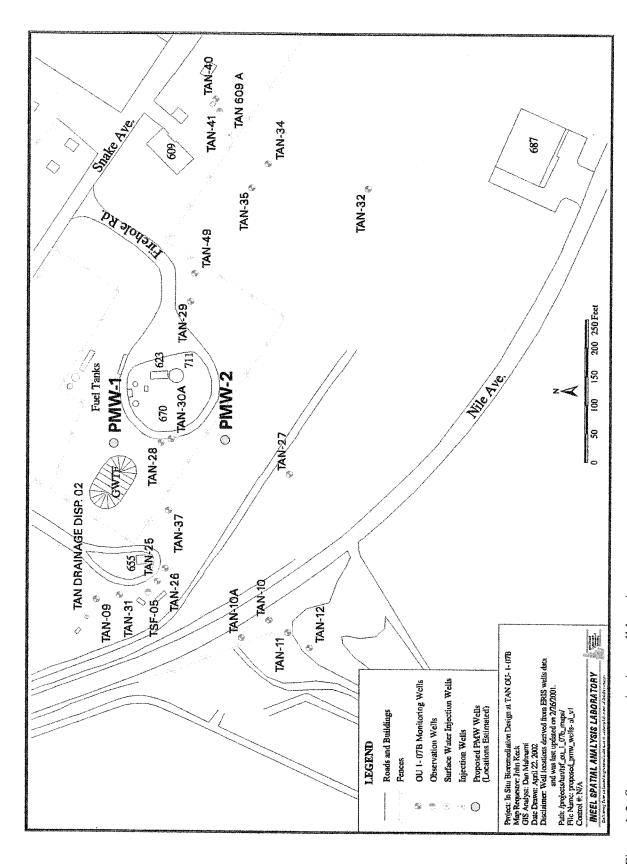


Figure 1-2. Source area monitoring well locations.

Figure 1-1 also shows the decisions to be made during remedy implementation including operational performance decisions and compliance decisions. Specific decisions corresponding to the numbers shown in Figure 1-1 include:

- Decision 1 Determine, in each of the four phases, whether operational changes are required by routinely monitoring the performance of the ISB system with respect to indicator parameters including VOCs, tritium, Sr-90, Cs-137, gross alpha, ethene/ethane/methane, redox parameters, electron donor, bioactivity, and nutrients
- **Decision 2** Determine whether downgradient flux of contaminants from the hotspot has been cut off, as evidenced by VOC concentrations below MCLs at TAN-28 and -30A
- **Decision 3** Determine whether crossgradient flux of contaminants from the hotspot has been cut off, as evidenced by VOC concentrations below MCLs at PMW-1 and PMW-2
- **Decision 4** Determine whether long-term operations are complete (the compliance criteria for long-term operations will be specified in the ISB Remedial Action Report).

Groundwater monitoring data are required during each phase of remedy implementation to support the decisions listed above. This GWMP implements the Environmental Protection Agency (EPA) data quality objectives (DQOs) process, which was used to design and implement a data collection plan to acquire the required data at quality levels appropriate for data uses for each phase. Data quality objective development is discussed in detail in the ISB RAWP (DOE-ID 2002a) and summarized in Section 2 of this GWMP. Following discussion of the DQOs, this GWMP presents the monitoring strategy for ISB, and defines the protocols to be used for groundwater sample management (i.e., collection, handling, and analysis), data management, and quality assurance (QA) activities associated with the ISB remedial action. This GWMP does not specifically address data collection for other OU 1-07B remedy components, which include pump-and-treat of the medial zone and monitored natural attenuation of the distal zone. However, data collected as part of ISB remedy implementation may be used by other remedy components to fulfill their respective data needs.

Supporting information for this GWMP is contained in Appendices C and D. Appendix C contains examples of the Sampling and Analysis Plan (SAP) tables that will be created for each sampling event to implement the sampling strategy. Actual SAP tables for each reporting period will be compiled in the ISB Periodic Report. Appendix D contains construction details for the monitoring wells that will be sampled.

1.1 Site Background and Hydrogeology

The TSF-05 injection well was used from 1953 to 1972 to dispose of liquid waste streams generated by operations at Test Area North (TAN). These waste streams included low-level radioactive wastewater, industrial wastewater including dissolved (and possibly pure) organic liquids, and sanitary sewage. The practice of waste injection into the Snake River Plain Aquifer (SRPA) resulted in a nearly 3-km (2-mi) long plume of contamination. Detailed descriptions of the historical background can be found in the Remedial Investigation Report (Kaminski et al. 1994) and in the Record of Decision (ROD) (DOE-ID 1995). The contaminants of concern in groundwater at the site include the VOCs trichloroethene (TCE), tetrachloroethene (PCE), trans-1,2-dichloroethene (trans-1,2-DCE), and cis-1,2-dichloroethene (cis-1,2-DCE), as well as the radionuclides tritium (H-3), strontium-90 (Sr-90), cesium-137 (Cs-137), and potentially uranium-234 (U-234). Figure 1-3 shows the contaminant plume and its location with respect to the Technical Support Facility (TSF).

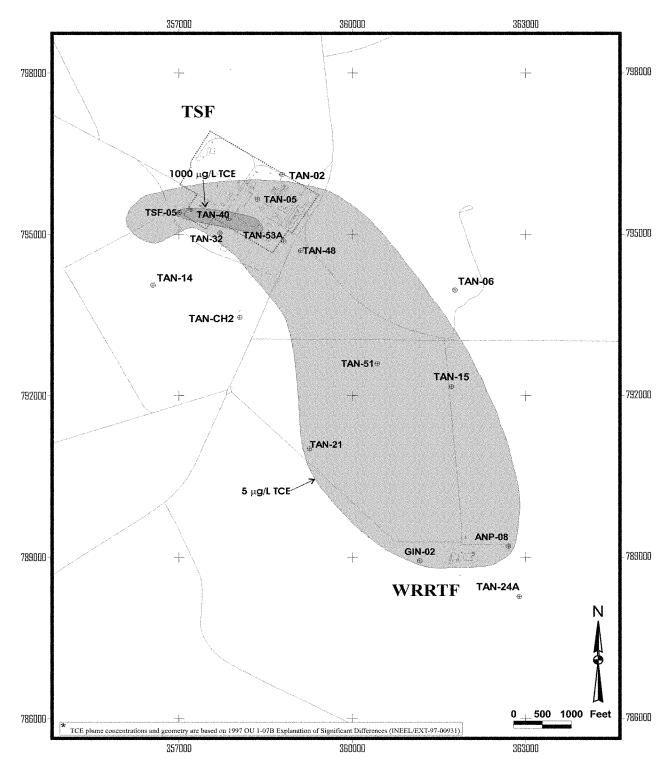


Figure 1-3. Contaminant plume at TAN.

The SRPA underlying TAN is composed of a complex layering of fractured basalt flows and sedimentary interbeds deposited during prolonged periods of volcanic quiescence. Depth to water in the vicinity of TAN is approximately 64 m (210 ft). The most significant recharge feature with respect to the groundwater contamination at TAN is a disposal pond west of Well TSF-05. Constructed in 1971 for disposal of the liquid waste streams previously discharged to the TSF-05 injection well, this pond receives on average about 104,300 L (27,550 gal) per day and 3.17 million L (838,000 gal) per month of wastewater based on 2001 operating records. Recharge from this pond is believed to play a significant role in the eastward migration of TCE from Well TSF-05 (Sorenson et al. 1996).

The aquifer at TAN appears to be unconfined, although locally confined conditions may exist due to the presence of sedimentary interbeds or dense, relatively impermeable basalt flows. The most significant sedimentary interbed at TAN occurs at about 125 m (410 ft) below land surface (bls) at Well TSF-05. This interbed ranges in thickness from about 2.4 m (8 ft) to more than 6 m (20 ft) and is laterally continuous and extensive. All evidence gathered to date suggests that this interbed effectively isolates the aquifer below it from the water above it. It is important to note that the interbed slopes at about one degree in a southerly direction, thus the thickness of the aquifer above the interbed at TAN increases from about 61 m (200 ft) near Well TSF-05 to more than 91 m (300 ft) at the leading edge of the TCE plume.

The TCE plume within the aquifer is stratified near the source area, with the highest concentrations in the upper portions of the aquifer. Several conceptual model reports published since extensive characterization work has been conducted detail the understanding of stratigraphy, aquifer behavior, and TCE plume dynamics (Bukowski and Sorenson 1998; Bukowski et al. 1998; Wymore et al. 2000).

1.2 Description of Remedial Action

In situ bioremediation was identified in the OU 1-07B ROD Amendment (DOE-ID 2001) as the remedy for the hotspot, which was defined in 1998 as that portion of the contaminant plume with TCE concentrations greater than 20,000 ug/L (DOE-ID 1995). In situ bioremediation takes advantage of naturally occurring bacteria that break down contaminants during metabolism of a food source. The particular application of ISB at TAN requires injection of an electron donor (i.e., sodium lactate, whey, or molasses) into the secondary source area. This amendment increases the number of bacteria, thereby increasing the rate at which the VOCs break down into nonhazardous compounds. This technology destroys the organic compounds in the hot spot without bringing them aboveground, preventing risk to workers and the environment. Based on actual field evaluations, ISB also degrades the secondary source. Degradation products generated by the bioremediation process (e.g., DCE and vinyl chloride) are degraded by the same process to ethene, chloride, water, and carbon dioxide.

Application of the ISB remedy at TAN will occur in the four phases described above, which are shown graphically in Figure 1-1 and described in detail in the ISB RAWP (DOE-ID 2002a). These phases begin and end based upon conditions observed in the groundwater. For this reason, groundwater monitoring is a necessary component of the remedial action. This plan documents the procedures and rationale for groundwater monitoring to be conducted during each of the four phases. In situ bioremediation operations and maintenance (O&M) for implementation of these four phases are addressed separately in the *ISB Operations and Maintenance Plan for Test Area North, Operable Unit 1-07B* (DOE-ID 2002b).

2. DATA QUALITY OBJECTIVES

Development of DQOs for the ISB component of the remedy is presented in detail in the ISB RAWP, and is summarized in this section. The DQOs have been prepared based on decisions requiring groundwater monitoring data, as well as on EPA DQO guidance (EPA 1994), method detection limits, and experience with the sampling and analysis methods to date. Requirements for data quality for all Idaho National Engineering and Environmental Laboratory (INEEL) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) investigations and remedial responses are defined in the *Quality Assurance Project Plan for Waste Area Groups 1, 2, 3, 4, 5, 6, 7 and 10* (DOE-ID 2000).

Decisions requiring groundwater monitoring data (see Figure 1-1) are listed in Section 1. The compliance decisions are based on the remedial action objectives (RAOs) and performance criteria for the ISB component of the remedy, as discussed in the RAWP. The operational decisions are based on performance indicators developed during 4 years of field evaluation at OU 1-07B, as described in the OU 1-07B ISB O&M Plan (DOE-ID 2002b). Application of the DQO process to these decisions has resulted in the data collection program described in Section 3.

3. DATA COLLECTION PROGRAM

This section describes the program designed to collect data at the appropriate locations, frequencies, and quality levels required to support decisions 1 through 4 listed in Section 1. It also contains details of the data collection program including sampling strategy, equipment, and procedures that support implementation of the ISB remedy component.

3.1 Sampling Strategy

The ISB sampling strategy for monitoring the status of the ISB remedy is based on the results of the DQO process and the experience gained from over 4 years of ISB field evaluation and pre-design operations. Two types of monitoring (i.e., performance and compliance) are defined and a detailed discussion of the specific indicator parameters for both types of monitoring is provided in the OU 1-07B ISB O&M Plan (DOE-ID 2002b).

Tables 3-1 and 3-2 portray the performance and compliance monitoring strategies, respectively, for the four operational phases. Monitoring strategy information includes monitoring locations, analytes, sampling frequencies, and data quality levels. Data quality levels are fully defined and their application is discussed in the Quality Assurance Project Plan (QAPjP) (DOE-ID 2000), as well as in the DQO development discussion in the RAWP. Definitive data have been required to date for assessing completion of remedial actions at the INEEL, and this data quality level is cited for ISB compliance monitoring for initial optimization and long-term operations. In general, definitive level data are generated using rigorous analytical methods such as approved EPA or American Society of Testing and Materials [ASTM] methods. Either analytical or total measurement error must be determined. Definitive data quality assurance/quality control (QA/QC) elements include (DOE-ID-2000):

- Sample documentation (e.g., location, date, time)
- Chain of custody
- Sampling design approach
- Initial and continuing calibration
- Determination and documentation of detection limits
- Analyte or property identification
- QC blanks (field and method)
- Matrix spike recoveries
- Analytical error determination. One sample will be analyzed in replicate and the mean and standard deviation determined and reported.
- Total measurement error determination. Replicate samples will be collected at one sampling location in each sampling round, analyzed, and the mean and standard deviation determined and reported.

Table 3-1. ISB remedial action groundwater performance monitoring strategy summary.

Monitoring Tyne/strategy		Operational Phase		
element	Interim	Initial	Optimization	Long-term
Decision number	1			
Monitoring locations	TSF-05A, TSF-05B, TAN-10A, TAN-25, TAN-26, TAN-27, TAN-28, TAN-29, TAN-30A, TAN-31, TAN-37A, TAN-37B, TAN-37C, and TAN-D2.	TSF-05A, TSF-05B, TAN-10A, TAN-25, TAN-26, TAN-27, TAN-28, TAN-29, TAN-30A, TAN-31, TAN-37A, TAN-37B, TAN-37C, and TAN-D2, PMW-1, PMW-2	, TAN-25, TAN-26, T. , TAN-37B, TAN-37C	AN-27, TAN-28, TAN-29,
Monitoring frequency/ Analytes	Monthly: VOCs (PCE, TCE, cis- and trans-DCE, vinyl chloride), electron donors (COD, lactate, acetate, propionate, butyrate), redox parameters (ferrous iron, sulfate), bioactivity parameters (alkalinity), dissolved gases (ethene, ethane, methane), and tritium. Quarterly: Sr-90 and gamma spectrometry (Cs-137) for TAN-29 only; definitive confirmation (offsite splits) for VOCs and ethane/ethane/methane Semiannual: Nutrients (ammonia-nitrogen, phosphate) Annual: Gross alpha	E, TCE, cis- and trans-DCE, vinyl chloride), electron donors (COD, lactabutyrate), redox parameters (ferrous iron, sulfate), bioactivity parameters d gases (ethene, ethane, methane), and tritium. I gamma spectrometry (Cs-137) for TAN-29 only; definitive confirmation DCs and ethane/methane its (ammonia-nitrogen, phosphate)	nors (COD, lactate, ivity parameters ive confirmation	Quarterly: VOCs (PCE, TCE, cis- and trans-DCE, vinyl chloride), electron donors (COD, lactate, acetate, propionate, butyrate), redox parameters (ferrous iron, sulfate), bioactivity parameters (alkalinity), dissolved gases (ethene, ethane, methane), and tritium; Sr-90, Cs-137 (TAN-29 only) Semiannual: Nutrients (annonia-nitrogen, phosphate) Annual: Gross alpha; definitive confirmation for VOCs and ethane/methane
Data quality required ^a	Screening w/definitive confirmation for VOCs and ethane/ethane/methane Definitive for radionuclides and definitive confirmation for VOCs and ethane/ethane/methane Screening for all other analytes	s and ethane/ethane/methane nfirmation for VOCs and ethane	/ethane/methane	
Data validation level required ^b	Level A for VOC and ethane/ethane/methane definitive confirmation and radionuclide analyses No data validation for onsite and IRC laboratory data	definitive confirmation and radiory data	ionuclide analyses	
a: Data quality levels are defined in the QAPjP.	d in the QAPjP.			

b: Data validation levels are defined in the QAPjP.

Table 3-2. ISB remedial action groundwater compliance monitoring strategy summary.

Monitoring		Оре	erational Phase	
Type/Strategy Element	Interim	Initial	Optimization	Long-term ^c
Decision number	N/A	2	3	4
Monitoring duration	N/A	1	year	TBD
Monitoring frequency	N/A	Qua	arterly	TBD
Monitoring locations	N/A	TAN-28 TAN-30A	PMW-1 PMW-2	TBD
Analytes	N/A	•	s- and trans-DCE, vinyl oride)	TBD
Data quality required ^a	N/A	Def	initive	TBD
Data validation level required ^b	N/A		vel A	TBD

a: Data quality levels are defined in the QAPiP.

Screening level data (generated using rapid, less precise analytical methods with less rigorous sample preparation) are cited for all performance monitoring indicators except VOCs, for which screening with definitive confirmation is specified. Screening with definitive confirmation is defined in the QAPjP as "...at least 10% of the screening data are confirmed using analytical methods and quality assurance/quality control (QA/QC) procedures and criteria associated with definitive data." Definitive confirmation will not be used for performance indicators that do not have action levels.

The overall OU 1-07B ISB remedial action performance and compliance monitoring sampling strategies are as follows:

- Interim operations performance monitoring (Decision 1): Includes monthly sampling for performance indicator parameters at 14 ISB locations listed in Table 3-1 for the duration of the phase. Monthly monitoring at the 14 existing locations during the ISB field evaluation and predesign operations was found to effectively identify trends in parameters that indicate ISB system performance (INEEL 2000). Shorter-interval sampling for subsets of the performance indicators may be implemented, as directed by the ISB Operations Technical Lead, to observe transient conditions, for example, when testing electron donor injection strategies. This performance monitoring strategy also includes deploying and maintaining in situ multiparameter monitoring probes, as directed by the ISB Operations Technical Lead.
- Initial operations performance monitoring (Decision 1): Includes monthly sampling for performance indicator parameters at 16 ISB locations (14 existing locations and planned monitoring wells PMW-1 and PMW-2) for the duration of the phase. This strategy incorporates monthly monitoring for VOCs at TAN-28 and -30A to determine downgradient contaminant flux trends. Similar to the interim operations performance monitoring strategy described above, shorter-interval sampling for subsets of the performance indicators may be implemented as directed by the

b: Data validation levels are defined in the OAPiP.

c: The Long-Term Compliance monitoring strategy will be submitted in the RA Report

N/A: Not applicable

TBD: To be determined

ISB Operations Technical Lead. This performance monitoring strategy also includes use of in situ multiparameter monitoring probes in specific wells, as directed by the ISB Operations Technical Lead.

- Initial operations compliance monitoring (Decision 2): The strategy for determining when downgradient flux is cut off includes quarterly monitoring for 1 year at TAN-28 and TAN-30A for VOCs. This sampling will begin when performance monitoring indicates that VOC concentrations are below MCLs at TAN-28 and -30A. These sampling events will be coordinated with regular monthly performance sampling; the samples will be analyzed using definitive methods.
- Optimization operations performance monitoring (Decision 1): Includes monthly sampling for performance indicator parameters at 16 ISB locations (14 existing locations and planned monitoring wells PMW-1 and PMW-2) for the duration of the phase. The monthly sampling frequency will be continued in order to identify any trends requiring operational modifications. This strategy incorporates monthly monitoring for VOCs at PMW-1 and PMW-2 to determine crossgradient contaminant flux trends. Shorter-interval sampling for subsets of the performance indicators may be implemented as directed by the ISB Operations Technical Lead. This performance monitoring strategy also includes use of in situ multiparameter monitoring probes in specific wells, as directed by the ISB Operations Technical Lead.
- Optimization operations compliance monitoring (Decision 3): The strategy for determining when crossgradient flux of contaminants from the hotspot is cut off includes quarterly monitoring for VOCs for 1 year at PMW-1 and PMW-2. This sampling will begin when performance monitoring indicates that VOC concentrations are below MCLs at PMW-1 and PMW-2. These sampling events will be coordinated with regular monthly performance sampling; the samples will be analyzed using definitive methods.
- Long-term operations performance monitoring (Decision 1): Includes quarterly sampling for performance indicator parameters at 16 ISB locations (14 existing locations and planned monitoring wells PMW-1 and PMW-2) for the duration of the phase. The ISB system will be functional and operational during this phase, with a defined operating strategy thereby reducing performance-sampling requirements. The number of monitoring locations and analytes may be reduced during this phase, as directed by the ISB Operations Technical Lead. Shorter-interval sampling for subsets of the performance indicators may be implemented as needed to observe transient conditions. This performance monitoring strategy also includes use of in situ multiparameter monitoring probes in specific wells, as directed by the ISB Operations Technical Lead.
- **Long-Term Operations compliance monitoring** (Decision 4): The Remedial Action Report will establish the sampling strategy to define when the remedy is complete.

Table 3-3 defines analytical methods, action levels, method detection limits, and data quality levels for each analyte and each monitoring phase. All other sampling and analysis details, including container types, sample preservation, holding time, analytical methods, and chain of custody (COC) requirements, are addressed in Section 4.

Samples may occasionally be collected for various research projects. Sampling and analysis tables will be prepared for these non-routine samples as required. Non-routine sampling will be coordinated with routine sampling to the extent feasible.

Table 3-3. ISB remedial action analytical method summary.

Table 3-3. ISB let		A 1 4 -1		Manitanian alaman adam
Analyte	Action level ^a	Analytical method	limit ^{b,c}	Monitoring phase or other data collection activity
VOCs				
	5 ug/L	EPA 524.2 wide-bore capillary column	0.19 µg/L	Compliance
TCE	N/A	SW-846 8260B	5 μg/L	Definitive confirmation
	N/A	SPME-GC-ECD	2 μg/L	Performance
	5 ug/L	EPA 524.2 wide-bore capillary column	0.14 μg/L	Compliance
PCE	N/A	SW-846 8260B	5 μg/L	Definitive confirmation
	N/A	SPME-GC-ECD	6 μg/L	Performance
	70 ug/L	EPA 524.2 wide-bore capillary column	0.12 μg/L	Compliance
cis-DCE	N/A	SW-846 8260B	5 μg/L	Definitive confirmation
	N/A	SPME-GC-ECD	2 μg/L	Performance
	100 ug/L	EPA 524.2 wide-bore capillary column	0.06 μg/L	Compliance
trans-DCE	N/A	SW-846 8260B	5 μg/L	Definitive confirmation
	N/A	SPME-GC-ECD	2 μg/L	Performance
	2 ug/L	EPA 524.2 wide-bore capillary column	0.17 μg/L	Compliance
vinyl chloride	N/A	SW-846 8260B	5 μg/L	Definitive confirmation
	N/A	SPME-GC-ECD	2 μg/L	Performance
Radionuclides				
Tritium	N/A	Liquid scintillation counting	400 pCi/L	Performance
Sr-90	N/A	Gas flow proportional	1 pCi/L	Performance
Cs-137	N/A	Gamma spectrometry	30 pCi/L	Performance
Gross alpha	N/A	Gas flow proportional	4 pCi/L	Performance
Electron donor				
Lactate	N/A	Ion chromatography	5 mg/L	Performance
Acetate	N/A	GC/FID	5 mg/L	Performance
Propionate	N/A	GC/FID	5 mg/L	Performance
Butyrate	N/A	GC/FID	5 mg/L	Performance
COD	N/A	Hach Method 10067	14 mg/L	Performance

Table 3-3. (continued).

Analyte	Action level ^a	Analytical method	Method Detection limit ^{b,c}	Monitoring phase or other data collection activity
Redox indicators				
Sulfate	N/A	Hach Method 8051	4.9 mg/L	Performance
Iron	N/A	Hach Method 8146	0.03 mg/L	Performance
рН	N/A	Multiparameter water quality probe	0-14 units	Performance
ORP	N/A	Multiparameter water quality probe	-999-+999 mV	Performance
Bioactivity indicators				
Alkalinity	N/A	Hach Method 8203	10 mg/L	Performance
Specific conductivity	N/A	Multiparameter water quality probe	0-100 mS/cm	Performance
Dissolved gases				
Ethene	N/A	GC-FID	1 ug/L	Performance
Ethane	N/A	GC-FID	1 ug/L	Performance
Methane	N/A	GC-FID	1 ug/L	Performance
Nutrients				
Ammonia nitrogen	N/A	Hach Method 10023 (for low range)	0.02 mg/L	Performance
		Hach Method 10031 (for high range)		
Orthophosphate	N/A	Hach Method 8048	0.05 mg/L	Performance

a: Action levels apply only to compliance monitoring, for which chloroethene levels are compared to MCLs to determine end of phase.

DCE = dichloroethene

FID = flame ionization detector

ORP = Oxidation Reduction Potential

PCE = Tetrachloroethene

SPME-GC-ECD = Solid Phase Micro Extraction - Gas Chromatography - Electron Capture Detector

VOC = Volatile Organic Compound

b: Method detection limits for: EPA method organics and radionuclides from DOE (2000), QAPjP for waste area groups (WAGs) 1, 2, 3, 4, 5, 6, 7, 10 and Inactive Sites; Hach methods from the Hach Manual; multiparameter water quality probe parameters ranges reported are from the Minisonde 4a manual; electron donor and SPME organics from IRC organics analyst Cathy Rae, personal communication.

c: For purposes of this groundwater monitoring plan, "Detection limits must not exceed one tenth the risk-based or decision-based concentrations for the contaminants of concern (DOE 2000)." This applies to compliance monitoring only. Chloroethene action levels were divided by ten and compared to the MDL to determine appropriate analytical methods for compliance monitoring.

3.2 Sampling Equipment and Procedures

Samples will be collected to implement the strategies summarized in Tables 3-1 and 3-2, per the SAP tables prepared prior to each sampling event by the Sample Management Office (SMO) under the direction of the ISB field team leader (FTL). Example SAP tables for each phase of operations and type of monitoring (performance or compliance) are presented in Appendix C. Sample collection activities will be performed by the FTL, Field Engineer, and sampling technicians. The general roles of each are defined in the *Test Area North Operable Unit 1-07B Final Groundwater Remedial Action Health and Safety Plan* (INEEL 2002a), while the specific responsibilities for each position are specified in the procedures referenced below. Sampling will be conducted using the equipment and techniques specified in TPR-165, "Low-Flow Groundwater Sampling Procedure." This procedure addresses training, equipment, instrument standardizations, purging, sampling, purge water management, decontamination and cleaning of equipment, and record keeping in support of this monitoring plan and will be updated as required for the duration of monitoring.

In situ multiparameter monitoring probes will be used for collecting purge parameter data during sampling, and for in situ deployment in wells specified by the ISB Operations Technical Lead for the duration of the remedy implementation. In situ multiparameter monitoring probes will be deployed, operated, and maintained as specified in the technical procedure (TPR) to be determined (TBD) for "In Situ Multiparameter Monitoring Probe Operations." This procedure addresses instrument standardization, programming and downloading, maintenance and repair, deployment and retrieval, and record keeping. It will be updated as required for the duration of monitoring.

Construction information for the OU 1-07B ISB monitoring wells is shown in Appendix D and is maintained in the OU 1-07B project files and the INEEL Hydrogeologic Data Repository. The information includes name, location, material type, depth, screened or open interval, top of casing elevation, pump type, discharge hose or pipe dimension, sampling depth, and estimated purge volume for each well (current as of the date of publication).

3.3 Waste Management

The sampling activities described above will generate potentially contaminated wipes, sample bottles, personal protective equipment (PPE), sample rinsates, and purge water. All wastes generated as a result of ISB groundwater monitoring activities will be managed in compliance with the requirements of the *Waste Management Plan for TAN Final Groundwater Remediation OU 1-07B* (INEEL 1999).

3.4 Health and Safety

Health and safety program requirements are addressed in the TAN OU 1-07B Health and Safety Plan (HASP) (INEEL 2002a). This HASP has been prepared to meet the Occupational Safety and Health Act (OSHA) standard for Hazardous Waste Operations and Emergency Response and governs all work performed as a part of ISB O&M.

4. SAMPLE MANAGEMENT AND ANALYSIS

The ISB final remedial action groundwater monitoring program includes three analytical components. These components include 1) onsite field analyses and measurements, 2) analyses performed at the INEEL Research Center (IRC), and 3) analyses performed at offsite laboratories. This section describes the protocols to be followed during all sample management (those activities immediately following sample collection) and analysis activities. The FTL is responsible for implementing all sample management protocols and the Field Lab Lead (FLL) is responsible for implementing all sample analysis protocols.

4.1 Sample Management

4.1.1 Sample Designation and SAP Tables

A character-based sample identification (ID) system determined by the SMO will be used to identify each sample with a unique ID code, which is provided by the SMO at the time the SAP tables are prepared. SAP tables will be used to record all pertinent information including monitoring locations, sample designations, media, dates, analysis types, and comments associated with each sample ID code. Example SAP tables for each monitoring phase are provided in Appendix C. In an effort to minimize SAP discrepancies, SAP tables will be prepared immediately prior to each sampling event and the completed SAP tables will be included in the ISB Periodic Report for the reporting period. The FTL is responsible for SAP table accuracy.

4.1.2 Sample Preservation and Preparation

Table 4-1 defines the analyses to be performed by the onsite field laboratory, IRC laboratory, and offsite laboratories. For each analyte listed, the container size and type, preservative, analytical method, and holding time is provided. Samples requiring 4°C preservation will be chilled in coolers containing frozen reusable ice immediately upon collection and maintained at a temperature \leq 4°C prior to shipment to ensure adequate preservation.

Sample bottles will be preserved prior to sample collection for those samples requiring zero headspace (i.e., ethene/ethane/methane and VOCs analyzed offsite). Appropriate acid will be added (and the pH checked after sample collection) to obtain a pH between 1.6 and 2 for those samples requiring preservation at pH < 2 that do not require zero headspace. Samples analyzed offsite will be handled and preserved per the governing SMO Task Order Statement (TOS).

The priority indicated in Table 4-1 for field laboratory analyses is related to the holding times for those particular analyses. All of the field analyses will be performed per TPR-166, "ISB Analyses Procedure" within the stated holding time. Those with a priority of 1 or 2 will be analyzed as soon as possible after collection.

Table 4-1. Sample collection and analysis requirements.

Comments		No headspace	No headspace				Must be analyzed immediately; collected in same container as sulfate: no headspace	Collected in same container as iron	Collected in same container as iron	Collected in same container as iron	
Holding		7 days	14 days	7 days	7 days		30 minutes	24 hrs	24 hrs	24 hrs	24 hrs
Analytical Method		SPME-GC-ECD	SW-846-8015M w/GC-FID	Ion chromatography	GC/FID		Hach Method 8146	Hach Method 8048	Hach Method 10023	Hach Method 10031	Hach Method 8203
Preservative		4°C	4° C and pH < 2 w/H ₂ SO ₄	4°C	4°C		none	4°C	4°C	4°C	4°C
Sample container size and type		Two glass 40-mL VOA vials	Two glass 40-mL VOA vials	One glass 40-mL VOA vial	One glass 40-mL VOA vial		250-ml HDPE	250-mL HDPE	250-mL HDPE	250-mL HDPE	125-mL HDPE
Analytes	IRC laboratory analyses	VOCs	Ethene/ethane/methane	Lactate	Acetate/Propionate/Butyrate	Field laboratory analyses (priority)	Iron (1)	Phosphate (2)	Nitrogen, ammonia, low range (3)	Nitrogen, ammonia, high range (4)	Alkalinity (5)

Table 4-1. (continued).					
Analytes	Sample container size and type	Preservative	Analytical Method	Holding time	Comments
Sulfate (6)	250-mL HDPE	4°C	Hach Method 8051	24 hrs	Collected in same container as iron
Chemical oxygen demand (7)	One glass 40-mL VOA vial	4°C	Hach Method 10067	28 days	Initial sample preparation within 1 hour of arrival at field laboratory
Offsite laboratory analyses					
VOCs	Three glass 40-mL VOA vials	4°C and pH<2 w/H ₂ SO ₄ (8260B) or HCl (524.2)	SW-846 8260B or EPA 524.2 (see Table 3-2)	14 days	No headspace
Gamma screen	1-540 mL HDPE	None	Gamma spectrometry	N/A	Required for samples from TSF-05, TAN-25, -26, -31 prior to shipment offsite
Cs-137	1-2 L HDPE	HNO ₃ to pH<2	Gamma Spectrometry	6 months	Collected at TAN-29 only
Sr-90	1-500 mL HDPE	HNO ₃ to pH<2	Gas flow proportional	6 months	Collected at TAN-29 only
Gross alpha	1-500 mL HDPE	HNO ₃ to pH<2	Gas flow proportional	6 months	

GC/FID = gas chromatography/flame ionization detection HDPE = high-density polyethylene VOA = volatile-organic analysis

4.1.3 Chain of Custody

To maintain and document possession of samples shipped to a laboratory for analysis, COC procedures will be followed per MCP-3480, "Environmental Instructions for Facilities, Processes, Materials and Equipment" and the QAPjP (DOE-ID 2000). The purpose of the COC is to document the identity of the sample and its handling from the point of collection until laboratory analysis is complete. The COC record is a multiple copy form that serves as a written record of the sample handling. When a sample changes custody, those personnel relinquishing and receiving the sample shall sign a COC record. Each change of possession will be documented. The COC procedures will begin immediately after sample collection. The sample ID number, date, and time will be entered on the COC form the day of sample collection. Sample bottles will be stored in a secured area accessible only to the field team members. A COC will not be initiated for those samples that are analyzed onsite in the field laboratory unless specified by the FTL or FLL, since these samples will not leave the custody of the field team members.

4.1.4 Transportation of Samples

Samples will be transported in accordance with the regulations issued by the Department of Transportation (49 *Code of Federal* Regulations [CFR]Parts 171 through 178) and EPA sample handling, packaging, and shipping methods (40 CFR 261.4[d] and [e]). All samples will be packaged in accordance with the requirements set forth in MCP-3480 and the governing TOS.

4.1.5 Radiological Screening

Samples collected from wells TAN-25, -26, -31, and TSF-05 must be surveyed using gamma spectrometry prior to analysis or shipment offsite. Radioactivity in all other wells to be sampled has historically been below levels of concern. Samples collected from other wells may be surveyed using gamma spectrometry under the direction of the Technical Lead, FTL, or Operations Supervisor.

4.2 Sample Analysis

Sample analysis will be conducted using three analytical components (i.e., the onsite field laboratory, the IRC laboratory, and SMO-appointed offsite laboratories) dependent upon holding time restrictions, analytical capabilities, and quality level requirements. Analytes and the analytical methods to be used for each of the three components are defined in Table 4-1. Quality assurance requirements associated with the activities taking place within each of the three components are described separately in Section 6. The onsite field laboratory, in addition to providing analytical resources, is also used for sample preparation activities in support of analyses to be conducted at both the IRC and offsite laboratories. A summary description of the laboratory activities is provided below.

4.2.1 Onsite Field Laboratory Activities

The field laboratory supports ISB project team activities for all three analytical components of the monitoring program. The field laboratory is the center for all onsite data collection activities including field test kits, in situ multiparameter monitoring probe data, and purge data. These activities provide near real-time data for evaluating the performance of the ISB remedy. In addition, the field laboratory is used for coordinating sample delivery to the IRC and for sample shipment to offsite laboratories, as described in Sections 4.1.1 through 4.1.5. Specific activities that the field laboratory supports include colorimeter operation, digital titrator operation, gross alpha-beta counts, and sample packing and shipping; in situ multiparameter monitoring probe deployment, maintenance, standardization, and downloading; and sample bottle preparation and administrative activities.

Field laboratory operations will be conducted by the FTL, FLL, Field Lab Technician, and In Situ Multiparameter Monitoring Probe Technician. The general roles of each are defined in the ISB HASP, while specific responsibilities are specified in the relevant procedure(s). Field laboratory operations and associated equipment are described in TPR-166, "ISB Analyses Procedures." In situ multiparameter monitoring probe deployment, maintenance, standardization, and downloading will be conducted using the equipment and techniques described in a TPR (TBD). These procedures will be updated as required for the duration of monitoring.

4.2.2 IRC Laboratory Activities

Analysts at the INEEL Research Center (IRC) laboratory analyze samples for chloroethene, ethene/ethane/methane, dissolved gases, lactate, and organic acids using the methods listed in Table 4-1. INEEL Research Center laboratory operations utilize one to two analysts in support of ISB groundwater monitoring operations. The IRC analyst roles are generally defined in the ISB HASP, while specific responsibilities, methods, equipment, and requirements are defined in TPR-166 as well as in Section 6.

4.2.3 Offsite Laboratory Activities

Offsite laboratories analyze samples for chloroethenes, ethane/ethane/methane, Cs-137, Sr-90, gross alpha and tritium using definitive methods. Specific requirements are defined in the TOS prepared by the INEEL's SMO for each analytical services subcontract.

5. DATA MANAGEMENT AND REPORTING

This section provides an overview of the process used for entering, compiling, and storing data collected in support of the ISB remedy activities. The detailed steps of the data management process are documented in a TPR (TBD) for ISB Data Management; the process is shown graphically in Figure 5-1.

Data are obtained from the following sources: the field laboratory (logbooks), in situ multiparameter monitoring probes (electronic files and purge log sheets), the IRC Laboratory (electronic data files), and offsite laboratories (offsite data packages from the SMO). Upon receipt of data from these sources, data are compiled and entered into electronic spreadsheets. Spreadsheets are organized according to the data types presented above, updated with new data consistent with respective sampling frequencies, and posted to the OU 1-07B server. Once posted to the server, the completed spreadsheets are used to evaluate data in the context of progress toward the objectives of the remedy, as described in detail in the ISB O&M Plan (DOE-ID 2002b).

Reporting requirements for ISB groundwater monitoring results are defined in the RAWP. All ISB groundwater monitoring information will be compiled in the ISB Periodic Report and will be provided to the agencies. Information reported will include analytical results, SAP tables, trend charts, QA results, interpretations, and operational changes. The Periodic Report will document progress of the ISB remedy toward meeting the performance criteria and RAOs and shall support agency 5-year reviews.

Additionally, quality assured sampling results will be submitted to the agencies as they become available, but no later than 120 days after sample collection. Non-quality assured data that support decision-making will be submitted as they become available. The formats for these submittals will be identified in the ISB Data Management TPR (TBD). Data will be submitted to the agencies in both electronic and hardcopy formats, as appropriate.

Data management and reporting activities will be conducted by the FTL, FLL, Data Entry Technician, In Situ Multiparameter Monitoring Probe Technician, SMO contact, Data Evaluation Lead, and Project Manager. The general roles of each are defined in the ISB HASP (INEEL 2002a), while specific responsibilities are defined in the ISB Data Management Procedure (TBD).

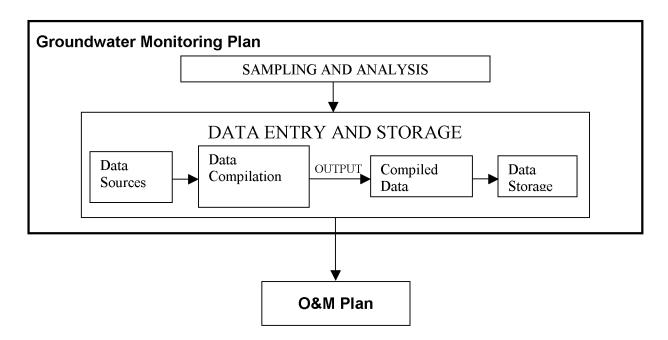


Figure 5-1. Data management process.

6. QUALITY ASSURANCE

This section presents or references requirements for QA, including field and laboratory QA types and frequencies; precision and accuracy; corrective actions; and reporting, for analyses performed in support of OU 1-07B ISB remedial action at the onsite field laboratory, the IRC laboratory, and offsite laboratories. Quality assurance will be implemented as specified in this plan, the QAPjP (DOE-ID 2000), PLN-694, "Environmental Restoration Program Management Plan," and TPR-166, "ISB Analyses Procedures."

For purposes of this groundwater monitoring plan, laboratory QA measures are those checks that an analyst routinely runs to determine precision and accuracy of the analytical methods and equipment (method error) and typically include blanks, standards, duplicates, standard reference materials (SRMs) and standard additions (matrix spikes). Field QA measures are sample types collected or prepared in the field during sampling and submitted to the laboratory to assess overall data quality of the sampling and analysis program (total measurement error). Field QA sample types include field blanks, trip blanks, and field duplicates. Compliance monitoring at TAN-28 and -30A, and at PMW-1 and -2 will be considered separate sampling events; for which one field blank, one field duplicate and one trip blank will be collected and analyzed for each respective well pair per sampling event.

Performance evaluation (PE) samples may be added to the OU 1-07B ISB Remedial Action QA program at the discretion of the ISB Technical Lead or Project Manager. If implemented, the PE program will be administered by the SMO with direction from the ISB Technical Lead regarding sample type, concentration ranges, frequency, and analytes for each performance period.

Data validation levels, as defined in the QAPjP, are identified in Section 6.3 for definitive offsite analyses only. Data from field laboratory or IRC analyses are not validated.

6.1 Field Laboratory

6.1.1 Laboratory and Field Quality Assurance

Laboratory QA for the onsite field laboratory includes analysis of blanks, duplicates, standards, and standard additions (matrix spikes). Procedures for preparing standards and standard additions, precision and accuracy requirements, and corrective actions for field laboratory internal QA checks are described in TPR-166.

Field QA includes the analysis of field blanks and field duplicates. Frequencies for field QA analyses are specified in Table 6-1.

6.1.2 Reporting

Control charts will be prepared and maintained for each QA parameter and analyte. The QA results will be evaluated and compiled as described in the ISB Data Management Procedure (TBD). Laboratory QA results and corrective actions will be summarized and reported in the ISB Periodic Report.

Table 6-1. Field QA frequency for ISB RA groundwater monitoring.

Sample Type	Frequency	Comments
Field Duplicate	1 per 20 samples ^{a,b}	All samples
Field blank	1 per 20 samples ^{a,b}	All samples
Trip blank	1 per sample cooler	For IRC VOCs and ethane/ethane methane and offsite samples only.
Definitive confirmation	Quarterly/annual performance sampling round	VOCs only
a: 1 sample for all analytes per day if number of	f monitoring locations is <20.	

b: 1 sample per round for compliance monitoring at TAN-28 and -30A; and at PMW-1 and -2.

6.2 IRC Laboratory

6.2.1 Internal and Field Quality Assurance

Laboratory QA for the IRC laboratory includes analysis of blanks, duplicates, standards, and standard additions (matrix spikes). Procedures for preparing standards and standard additions; precision and accuracy requirements; and corrective actions for OU 1-07B ISB remedial action IRC laboratory analyses are described in the "OU 1-07B ISB Remedial Action IRC Analyses Procedures," (TBD).

Field QA includes the analysis of field blanks and field duplicates. Frequencies for field QA analyses are specified in Table 6-1.

6.2.2 Reporting

IRC QA results will be evaluated and compiled as described in the ISB Data Management Procedure (TBD). Control charts will be prepared and maintained for each QA parameter and analyte. Internal QA results and corrective actions will be summarized and reported in the ISB Periodic Report.

6.3 Offsite Laboratories

6.3.1 Laboratory and Field Quality Assurance

Laboratory QA for the offsite laboratories includes blanks, duplicates, standards, and standard additions (matrix spikes). Offsite laboratory QA requirements established in the QAPjP are based on definitive data requirements (Table 6-2).

Field QA includes field blanks, trip blanks and field duplicates. Frequencies for field QA analyses are specified in Table 6-1.

Table 6-2. Laboratory QA requirements for definitive data^a.

QA Parameter	VOCs	Parameter calculated
Precision		
Duplicates	TCE: ±14%	Relative percent difference (RPD)
Accuracy		
Standards	71-120%	% recovery
Matrix spikes	71-120%	% recovery
Completeness		
Definitive confirmation	90%	% complete
Compliance monitoring	100%	% complete
a: as defined by the QAPjP		

6.3.2 Corrective Actions

Corrective action requirements are established by the SMO in the TOS for the performing laboratory.

6.3.3 Reporting

Laboratory reporting requirements for offsite laboratory QA are established by the SMO in the TOS for the performing laboratory. Offsite laboratory QA results will be evaluated and compiled as described in the ISB Data Management Procedure (TBD) and will be summarized and reported in the ISB Periodic Report.

6.3.4 Data Validation

Definitive data from offsite analyses will be validated to Level A, as specified in the QAPjP.

7. REFERENCES

- Bukowski, J. M., and K. S. Sorenson, 1998, "Site Conceptual Model: 1996 Activities, Data Analysis, and Interpretation for Test Area North Operable Unit 1-07B," INEL-97-0056, Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho.
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- DOE-ID, 2000, *Quality Assurance Project Plan for Waste Area Groups 1, 2, 3, 4, 5, 6, 7, 10 and Inactive Sites*, DOE/ID-10587, Revision 6, U. S. Department of Energy Idaho Operations Office, Idaho Falls, Idaho, September 2000.
- DOE-ID, 2001, Record of Decision Amendment for the Technical Support Facility Injection Well (TSF-05) and Surrounding Groundwater Contamination (TSF-23) and Miscellaneous No Action Sites Final Remedial Action, DOE/ID-10139, Revision 0, U.S. Department of Energy Idaho Operations Office, Idaho Falls, Idaho.
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- DOE-ID, 2002b, ISB Operations and Maintenance Plan for Test Area North, Operable Unit 1-07B, DOE/ID-11012, Revision 0, U. S. Department of Energy Idaho Operations Office, Idaho Falls, Idaho.
- 40 CFR 261.4 (d)(e), 2002, Title 40, "Protection of the Environment," Part 261, "Identification and Listing of Hazardous Waste," *Code of Federal Regulations*, Office of the Federal Register.
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- 49 CFR 172, 2001, Title 49, "Transportation," Part, 172, "Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements," *Code of Federal Regulations*, Office of the Federal Register, October 2001.
- 49 CFR 173, 2001, Title 49, "Transportation," Part 173, "Shippers—General Requirements for Shipments and Packagings," *Code of Federal Regulations*, Office of the Federal Register, October 2001.
- 49 CFR 174, 2001, Title 49, "Transportation," Part 174, "Carriage by Rail," *Code of Federal Regulations*, Office of the Federal Register, October 2001.
- 49 CFR 175, 2001, Title 49, "Transportation," Part 175, "Carriage by Aircraft," *Code of Federal Regulations*, Office of the Federal Register, October 2001.

- 49 CFR 176, 2001, Title 49, "Transportation," Part 176, "Carriage by Vessel," *Code of Federal Regulations*, Office of the Federal Register, October 2001.
- 49 CFR 177, 2001, Title 49, "Transportation," Part 177, "Carriage by Public Highway," *Code of Federal Regulations*, Office of the Federal Register, October 2001.
- 49 CFR 178, 2001, Title 49, "Transportation," Part 178, "Specifications for Packagings," *Code of Federal Regulations*, Office of the Federal Register, October 2001.
- EPA, 1994, "Guidance for the Data Quality Objectives Process," EPA QA/G-4, EPA/600/R-96/055, U.S. Environmental Protection Agency, September 1994.
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- INEEL, 2000, Field Evaluation Report of Enhanced In Situ Bioremediation, Test Area North, Operable Unit 1-07B, INEEL/EXT-2000-00258, Revision 0, Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho, July 2000.
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- TPR-165, "Low-Flow Groundwater Sampling," Revision 5, Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho, January 2002.
- TPR-166, "ISB Analyses Procedures," Revision 4, Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho, June 2001.
- TPR-4907, "Installation and Removal of Equipment in TAN Wells," Revision 0, Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho, April 2002.
- Wymore, R. A., J. M. Bukowski, and K. S. Sorenson, Jr., 2000, Site Conceptual Model: 1998 and 1999 Activities, Data Analysis, and Interpretation for Test Area North Operable Unit 1-07B,

INEEL/EXT-2000-00188, Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho, December 2000.

7.1 Documents to be Prepared

- INEEL, "Statement of Work for IRC Analyses in Support of OU 1-07B ISB," Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho, TBD.
- INEEL, "ISB Data Management Procedure for TAN Final Groundwater Remediation, OU 1-07B," Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho, TBD.
- INEEL, "OU 1-07B ISB Remedial Action IRC Analyses Procedures," Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho, TBD.
- TPR-TBD, "In Situ Multiparameter Monitoring Probe Operations," Idaho National Engineering and Environmental Laboratory, Idaho Falls, Idaho.

Appendix A

Agency Comments and Resolutions for the In Situ Bioremediation Groundwater Monitoring Plan

Table A-1. E	PA Region 1	0 comments on the In Situ	Table A-1. EPA Region 10 comments on the In Situ Bioremediation Groundwater Monitoring Plan.	,
Comment No.	Page No.	Doc/Sect.	Comment	Resolution
EPA-1.	7	INEEL/EXT- 2002-00779 Fig 1	The "End of Remedial Action" requires definition, as "Institutional Controls" are a component of the remedial action	Comment incorporated. The wording will be revised to "End of Active ISB RA," and Institutional Controls will be deleted from Figure 1. The criterion "RAOs met" will be added for
EPA-2.		INEEL/EXT- 2002-00779	Given the nature of the hot spot, a geological cross section of the area within 250 ft downgradient and crossgradient of TSF-05 would paragraph, as sources for this type of information.	Comment noted. The Site Conceptual Model Reports are referenced in Section 1.1, last paragraph, as sources for this type of information.
EPA-3.	21	INEEL/EXT- 2002-00779 Tbl 5	For this project, the field blank should be 1/d minimum and 1/20 if a large number of samples are collected in a day	Comment incorporated.
EPA-4.	21	INEEL/EXT- 2002-00779	Are any equipment rinsate blanks planned?	Comment noted. No equipment rinsates are planned since all wells will have dedicated pumps and no decon between wells is required.
EPA-5.	21	INEEL/EXT- 2002-00779	What about reporting to Agencies (e.g., submittal of sampling data in accordance with FFA/CO ' 19.1)?	Comment incorporated. The GWMP Section 5 will be revised to state that quality assured data will be submitted as they become available, but no later than 120 days after sample collection; and that non-quality assured data supporting decision-making will be submitted as it becomes available; as per FFA/CO Sections 19.1 and 19.2.
EPA-6.	22	INEEL/EXT- 2002-00779	It would be helpful to further refine the definition of "definitive," for example, are any data considered "critical" which requires 100% completeness?	Comment incorporated. Compliance data will be stated to require 100% completeness.
EPA-7.	22	INEEL/EXT- 2002-00779	What about reporting to Agencies (e.g., submittal of sampling data in accordance with FFA/CO ' 19.1)?	Comment incorporated; please see the response to EPA Comment #5.

monitoring requirement for MNA covered under the ISB sampling regime. As noted noted. The annual definitive confirmation quality of the VOC SPME-GC-ECD data Comment incorporated. The ISB RAWP long-term operations, which will define Comment incorporated. The text will be managed in compliance with the Waste a) Comment incorporated. b) Comment assessment, but are used to upgrade the Decision 4, the compliance criteria for other remedy component requirements. will include a crosswalk showing how component support the overall remedy revised to read "...all wastes...will be when the active ISB RA is completed, Comment noted. As stated on p. 4 for will be specified in the ISB Remedial monitoring requirements, and thereby in EPA-1 the requirements, goals and PM/CM monitoring for each remedy objectives for radionuclides will be compliance with MCLs nor for risk data are not used for determining These COCs will be added as a defined in the MNA work plan. confirmation" as per the QAPjP to "screening with definitive Resolution Comment incorporated. Management Plan..." Action Report. As this paragraph currently reads, the purge water will To be consistent with the remainder of the document, A Method Detection Limit (MDL) is presented for all delete purge from the list of waste or state that purge important considering a ±14% definitive data criteria adhere to the natural substrate, this assumption must radionuclides, especially Sr-90 or Cs-137. Although If the annual definitive confirmation data is the final None of these decision points include evaluation of water and developments may be treated through the be package and handled as hazardous waste. Either Applicable radionuclides need to be added to these DCE. Please provide a MDL to complete this table. MCLs or to be used as a risk base decision-making We should identify in this document what types of constituents and analytical methods except for cisdecision mechanism to determine compliance with the current thought is that these radionuclides will data and how this data will fulfill other remedies' this sentence should state that this phase of the tool, the MDLs are too high. This is especially operations would be complete when VOC be verified through this monitoring plan. Comment concentrations are below MCLs. Table A-2. IDEQ comments on the In Situ Bioremediation Groundwater Monitoring Plan. respective data needs. NPTF and reinjected. tables. Tables 3-1 and 3-2 Location 4th Bullet, Last Sentence Decisions 1-4 2nd Paragraph Table 3-3 Section Section 3.3 Section 3.1 Section 1 Section 1 Section 1 Section 3 Page No. 4 \prod 12 4 6 Comment IDEQ-1. IDEQ-3. IDEQ-4. IDEQ-2. IDEQ-5. IDEQ-6.

a) Comment incorporated. b) millisiemens This table only calls for 5% duplicate sampling for the |Comment noted. The duplicate frequency field laboratory. Justification is needed to use less than of 1 per 20 samples (5%) is the minimum match MDLs. c) Comment incorporated, (mS) per cm are the correct units for the Comment noted. Please see response to Sr-90 and Cs-137 will be added to the for TCE, as per Table 6-2. A MDL of 3 or even 4 µg/L definition. Therefore MCLs need not the 10% duplicate sampling called for in the site-wide specified in Table 1-5 of the QAPjP. QAPjP. Please provide this justification or increase the Additionally, a minimum duplicate in situ water quality probes used. frequency of 1/day will be added. Resolution IDHW Comment #9. Comment noted. analyte list. Specific conductivity is usually reported as microS/cm TAN-37. Obviously, there are reasons to not make this (µS/cm) and not as milliS/cm (mS/com). Please verify the 10% duplicate sampling called for in the site-wide MDL for Method 8260B must also be 2 μg/L or less. The MCL for vinyl chloride is 2 μ g/L; therefore, the be followed for the number of duplicate samples that Appendix A that the percentage is less than 10%, but It is not clear from this description if the QAPiP will It may be worth noting potential wells that the FTL identification but it is worth discussion between the the units intended for this parameter and correct as Please correct PH to pH, the standard designation. shipment. One well that would be considered is greater than 20%. Please clarify the level of QA will be collected and analyzed. It appears from Add Sr-90 and Cs-137 to the radionuclide list. may identify for gamma spectrometry prior to samples that will be collected and analyzed. will eliminate a lot of future questions. Comment number of duplicate samples. agencies. needed. Location Table 6-1 Section Section 4.1.5 Section 6.1.1 Section 6.3.1 Ibid. Page No. 13 17 21 21 Comment Š IDEQ-10. IDEQ-7. IDEQ-9. IDEO-8.

Table A-2. (continued)

Resolution Comment incorporated. the numbers do not match, please provide a footnote to instance, the sampling depth for TSF-05A is stated as 235 ft but the discharge line is 275 ft. TAN-25 is shown with a sampling depth of 257 ft but the discharge line is only 218 ft. Please verify the entries in this table and correct as needed. If there is a reason The values presented for "Sampling Depth" are not consistent with the depths presented for "Length of discharge line" and "Screened interval(s)." For Comment explain how the numbers work. Location Section Appendix B Page No. Table A-2. (continued). B-1 Comment Š. IDEQ-11.

Appendix B

Agency Comments and Resolutions for the In Situ Bioremediation Groundwater Monitoring Plan

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iani.	Resolution	Agree; footnote added.	Agree.	
TOTAL TANGENT TANGENT TOTAL TANGENT TANG	Comment	There should be a footnote identifying that the long-term compliance monitoring sampling strategy will be submitted in the Remedial Action Report, a primary document.	Please include that the Agencies will be provided with sampling results in both written and electronic format (e.g., Excel spreadsheet)	
	Doc/Section	INEEL/EXT- 2002-00779 Table 3-2	INEEL/EXT- 2002-00779 Sect 5	
	Page No.	10	20	
	Comment No.	EPA-1.	EPA-2.	

Table B-2. IDEQ Comments for the In Situ Bioremediation Groundwater Monitoring Plan.

	Resolution	A crosswalk table has been added to Section 2 of the RAWP (Table 2.2) which mans the different	monitoring requirements to the remedial component for which it is applicable. TAN-29 monitoring has	contingent/upgradient monitoring strategy is in	Agree; comment incorporated.			Agree; comment incorporated.					
imi i Siiroiroir	Comment	Applicable radionuclides need to be added to these tables. Sr-90 and Cs-137 were added to Table 3-1, however, only	for monitoring well TAN-29 on a quarterly basis. It appears to DEQ that sampling a number of monitoring wells along the suspected axis of the plume will provide trend data	which will be much more useful than the proposed sampling routine.	TAN-27's location near the outer edge of the plume makes it a valuable monitoring well. Whether inadvertently left	out of Table 3-1 or not, it should be added.		Some values presented for "Sampling Depth" are not consistent with the depths presented for "Length of	discharge line" and "Screened interval(s)." Please verify the entries in this table and correct as needed 16 there is a	reason the numbers do not match, please provide a footnote	Monitoring wells TCE OSA and TANK OS	however, there are still several wells in the table where the	sampling depth and discharge line length do not match, such as TAN-10A
	Doc/Section	INEEL/EXT- 2002-00779	Section 3 Tables 3-1 & 3-2		INEEL/EXT- 2002-00779	Section 3	Table 3-1	INEEL/EXT- 2002-00779	Appendix D	ו מטוני ער-ז		_	
	Page No.	6								16			
-	Comment No.	IDEQ-1.			IDEQ-2.			IDEQ-3.		**			

Appendix C Example Sampling and Analysis Plan Tables

Plan Tatán Mumber: INTERIM, MONTHLY SAF Humber: INEELEXT-2002-00779 Dark: 1977/2002 Plan Tabin Ransion: 0.0

DRAFT Project OU 1-078 ISB REMEDIAL ACTION GAIM - INTERBA MONTHLY (PM)

Sample: Carrol, R. E. SMO Contact. KIRCHNER, D. R.

Page 1 of

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DRAFT Project OU 1-07B ISB REMEDIAL ACTION GWM. INTERIM MONTHLY (PM)

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Project Manager: NELSON, L. O.

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Project Manager: NELSON, L.O.

Project OU 1-079 ISB REMEINAL ACTION GWAR-INTERIA QUARTERLY (PM)

SMO Contact KIRCHNER, D. R. Samplen Carroll, R. E.

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Project OU 1-078 ISB REMEDIAL ACTION GAM - INTEREM QUARTERLY (PM)

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Date: 1017/2002

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Page 2 of

Project Manager: NELSON, L. D.

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Date: 10/17/2002

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Project Manager: NELSON, L.O.

SMO Contact ((IRCHNER, D. R. Sampler: Carrol, R. E.

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Date: 10/17/2002

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SMO Confact KIRCHNER, D. R. Sampler, Carroll, R. E.

Erier Analysis Types (AT) and Quantity Requested € e Location Sample Location Type of Location Area Planned Date Sampling Method T Sel Semple Description Sample Metrix

aur en haid gysteroe Korps and sample Meeth.	VOCe (TAL) - wirel chierties, trichicombines perantiment via 1 2 destances.	inna-12-de/arochene		Field Tects - Analysis Suite #1, alk retrity, and COD	Spill tamples will be collected at 98 bootlons for WOCs (TAL) and Ethanus Enhance seatons are consequently								
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Plan Table Number: INTERIAL JANKUAL. BAY Humber: INEBLEXIT-2002-00779 Dalls: 1:04/2002 Plan Table Revision: 1.6 Project: OUI-078189 REMEDIAL ACTION GAM.: INTERIALAMINAL (P.I.).

DRAFT

Project Manager: NELSON, L. O.

Sample: Canol, R.E. SMO Cantact: KIRCHNER, D. R.

Page 1 of

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		Sampie Description						Semple	Sample Location							"	A PER	ak Jak	1	(14)	ã	Enter Assertes Types (AT) and Quantity Requested	l day	١,	-	İ	-	
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IAN004	SEC.	GROUND WATER	9 8	\perp	1/0/2/002	1	TAN	MONITORING WELL	TAN 28 (1118)	386	-	-	-		┞	-		-	1-	+	-	2	╀	+	1	\perp	+	T
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IAND11	REG	GROUND WATER	GPA8		110000000			ACM TORING WELL	TAN-37B (1163)	272	-	-		2			Г	Т	-	-	~	-	L				L	Τ
IAN012	REG	GROUND WATER	ě		noonal .	1	_	MONITORING WELL	TAN-37C (1163)	375	-	-	2	$oxedsymbol{oxed}$				†	-	╀-	-	-		ļ.,	I		I	T
JAND13	AFG.	GROUND WATER	9	\int	1165/2002		,	MONITORING WELL	TAN-10A (348)	233	-	-	~	L			T	+	+-	+	+	\perp		\perp	I	Ι	I	T
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Plan Table Revision: 1.0 Date: 1154/2002

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Project Manager: NELSON, L. O.

SMO Contact KIRCHNER, D. R. Sample: Carroll R.E.

| A11 | A72 | A13 | A14 | A15 | A19 | A10 | A11 | A10 | A11 | A12 | A12 | A13 | A14 | A15 | A19 | A10 | A11 | A12 | A13 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 | A19 E E Location Sample Location Type of Location

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Sample Description

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¥		The complete cample identification number (10 characters) will appear on field guidance forms and sample labels	
ATZ	Angelogia Guide #1	ATM: 88-80	Commonte:
ATS			VOCE (TAL) - vinyl chloride, inchisrosthere, let achievoethere, cle-1,2-dichloroethere, and
AT4:		VOCs (TAL)	Imma-1,2-dichloroethane
Ā	Ehune/EleneAlethane - MSAAED	VOC6 (TAL) - MSIARSD	Field Testin - Analysis Suite #1, alk same,, COD
AT8	Piekt Standard Addillon - QC		O. B. Carrier and C.
ATT	Gathma Screen		oon campes MI be collected at all boalens for VOCs (TAL) and Ethane-Ethane-Methans analyses
A TB	Germin Spec	ATD:	
AIR	Gross Alpha	A118.	
AT10	ATIO Propional Bury min/Actional accom-	AT18.	
Analys	Abulyain Suithe:	A120:	
Amely	Arreitzis Suth #1: Armonia Nillogen, Proseinate, Suttale, Iron (Broggant, Apalysis)	Confrigencies	

Plan Table Revision: 6.0 Project OU 1-078 ISB REMEDAL ACTION GW - INITIAL MONTHLY (PM)

Plan Table Marcher INTTAL_MONTRLY
94P Number: INEBLEXT-2002-0979
Date: 1029/2002 Plan Table Revision

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Sempler: Carroll, R. E. SMO Cantact: KIRCHNER, D. R.

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	-	Sample Description	j				Sample Location	Location			-	-	F	t	1	Etter Analysis Types (AT) and Quantity Requested) Page (A)	Ē		See 1	₃ ŀ	-	Ī	-
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104002	REG	GROUND WATER	S. S.		1.1	TAN	MONITORING WELL	TAN-25 (1117)	218	_	-	-		L	-	-	-	\vdash				L		╀
KNOWOO	REG	GROUND WATER	GRAB		1.1	TAN	MONITORING WELL	TAN-26 (1118)	382	-	-	-		-	-	-	-	 			┢	_		┢
IOM004	REG	GROUND WATER	GRAB B		1.1	NAT	MONITORING WELL	TAN-27 (1008)	235	-	-	-			-	-	-	╁			H	ļ		┢
KOMBOS	REGIOC	GROUND WATER	g		11	TAN	MONITORING WELL	TAN-28 (1008)	240	~	~	2 2		L	7	~	2	⊢	L		-	L	L	-
HOMBOG	REG	GROUND WATER	98/86		11	TAN	MONITORING WELL	TAN-29 (1010)	253	-	 -	-		Ħ	+	-	-	+			╀	<u> </u>	_	╁
10M007	RÉG	GROUND WATER	GRAB		11	TAN	MONITORING WELL	TAN-30A (1012)	310	-	-	-		L	-	Ξ	T	-	<u> </u>		-	<u> </u>		╁
BOGHO!	REG	GROUND WATER	GRAB.		11	TAN	MOMTORING WELL	TAN-31 (1219)	258	-	-	-		T	<u>-</u>	Ξ	-	+		T	-	_		╁
HOMBOB	REG	GROUND WATER	GRAB	!	11	TAN	MONITORING WELL	TAN-37A (1163)	240	-	-	-	Ξ	_	-	Ξ	-	+		t	╁	_		╀
IOM010	REG	GROUND WATER	GRAB		11	TAN	MONITORING WELL	TAN-37B (1163)	27.5	-	Ė	-		<u> </u>	-	-	-	\vdash		┢	┢	_		┢
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IOM012	PEG	GROUND WATER	GRAB		11	TAN	MONITORING WELL	TAN-10A (348)	233	-	-	-		├	-	-	-	╁		t	╀			╀
: IOMD13	REG	GROUND WATER	GRAB	_	1.1	TAN	MONITORING WELL	TAN-D2 (339)	34	-	-	-			-	-	-	⊢			⊢	ļ.,		┝
POMD14	REG	GROUND WATER	3848		11	TAN	MONITORING WELL	PLAN-1	æ	-	-	-		H	-	-	-	┢╌				L		_
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SIMD16	8	GROUND WATER	FBLK		11	TAN	FIELD BLANK	8	¥	١	-	-			-	-	-	\vdash			\vdash			┝
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	<u>_</u>						AT11: VCCs (TAL) - M8/MSD					3	Comments:		:	;								
	Analysis Sults #1						ATI2					9 <u>\$</u>	VOCa (TAL) - virgi chlori Frans: 1 2-dichlorosthate	Appropria	VOCE [7.84] - virgi chicride, tichicroethere, betrachterestrare, cis-1,2-dichicroethere, and trans. (3-28th teneditare)		\$ \$		confinen	e. G6-1,	2-dichlor	Selfiera	2	-
AT3: Chemio	Chemical Oxygen Demand	pia			ļ		ATIS					<u> </u>	3				i				Ì			
	Efrana/Efrepa/Nertrane	•					ATIA						100	Analys	Field Tests - Analysis Suits #1, Alkelinity, and Chemical Oxygen Demand	H, Alkell	mity, an	Chemi	an Oxyg	E Dem	g			$ \ $
	Efrana/Efrans-Methans - MS/MSD	e-MS/MSD					AT15:				-	۱								1				
	Field Standard Addition - QC	20:					AT16:								l								۱	
	Сатин Эствел						AT17:					إا	$ \ $		$ \ $	$\ \ $								$ \cdot $
ATR: Propion	Propion atta-Butyn atta/Acetata/Lactate	erzte/Lectrio					A716.				ı													
AT9: Tribum							AT19:					1							1					
AT10: VOC#(TAL)	TAL)						AT20:					H	$\ \ $						$\ \ $	Ш				
Analysis Sulles. Analysis Sulle #	E: #1: Suffate, Iron	Analysis Sultae: Analysis Sulta #7: Sulfate, Yon (teorganic Analysis)		i			į	Confingencies:																
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Plan Table Number: HITHAL MONTHLY 3AP Number: INSENEXT-2002-00779

Plan Table Revision: 0.0

Date: 10/28/2002

Project OU 1-078 ISB REMEDIAL ACTION GW - INITIAL MONTHLY (PM)

DRAFT

Project Menager: NELSON, L.O.

SMO Centact KIRCHNER, D. R.

Enter Analysis Types (AT) and Quantity Requested \$ € ₹ Dogum 8 Sample Location Type of Location TRIP BLANK A A Planned 7 Sampling Method Co. Fact. GROUND WATER Sample Metrix 8 F 8 Sampling Activity IOM017

	I in everyone surppy management in the characters) will appear on field guidance forms and surppy labels.	Course (CC) and	A12. (Mar.) Zubikonstran. (Mar.) Zubikonstran.		Field Teats - Amelying Surfe #1, Albainty, and Chembral Copyen Demand	A I I I	50.14	AND	A18	ATIN.	1.14.	Configurations			
The sampling activity displayed on this table represents the first aix characters of the sample identification rumbar	ATT: Akulleity	AT2. Applicate Suite #1	A13: Chemical Oxygen Demand	Alt. EheraEhenaMethore	ATS: Ethers-Ethenshirthure - MSJASD	ATS: Field Standard Addition - GC	AT7. Germa Screen	ATS: Propionale-Buly man-Mostering actails	ATQ. Titthum	ATIO VOCA(TAL)	Anatysis Bulbas	Analysis Suite #11 Suitate, from (Prongamic Analysis)			

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Plan Table Number: INSTITAL_CRETLY SAP Number: INSEL/EXT-2002-60779

Plan Table Revision: 0.0

11/04/2002

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DRAFT Preject OU 1-07B ISB REMEDIAL ACTION GW - INITIAL QUARTERLY (PM)

Project Manager: NELSON, L. O.

SMO Contact: KIRCHNER, D. R.

ATI AT2 AT3 AT4 AT5 AT6 AT6 AT8 AT8 AT8 AT8 AT14AT12AT13AT14AT19AT19AT7AT18AT19AT2 Spit serrotes for VOCs (TAL) and Ethans Ethans Medians analyses will be collected. One set will go to RC and the other to food abla laboratory VOCE (TAL) - vitryl chicalds, frontace/ters, tetrachicnosthese, ob-1,2-dicrieocedhene, and Erlar Analysis Types (AT) and Quandly Requested Field Tests - Analysis Suite #1, Alkalinity, and Chemical Oxygen Deman A1 3A C5 EG E3 F9 R5 R4 1N R8 R8 VA VE Irans-1,2-dichloroetham --The complete sample identification number (10 characters) will appear on field guidence forms and sample tables. **新**图 器 0*L*Z 218 8 \$2 **3** 22 윮 98 22 S ž 375 ₹ 5 ≨ TAN-27 (1008) TAN-30A (1012) TSF-05A (71) TAN-37A (1183) T3F-05B (71) TAN-25 (1117) TAN-28 (1118) TAN-28 (1008) TAN-29 (1010) TAN-31 (1219) TAN-37B (1183) TAN-37C (1163) TAN-02 (338) Contrigencies TAN-10A (348) Cocation PLAM-1 PMM-2 8 Sample Location VOC. (TAL) - MEMISD MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONTORING WELL MONTORING WELL MONITORING WELL FIELD BLANK VOCe (TAL) Type of Location ATT: Trikum ATIZ AT13 A714 ATTS AT16 AT17 AT18: AT 18 AT20 Ş Ϋ́ YA. Ā ¥ ž Ā ¥ ž 3 ž Ā Š 1AN ¥ ¥ Ϋ́ TĀ The sampling activity displayed on this table represents the first six characters of the earspla identification rumber. Planned Date : 7 i2 11 7 -= 11 7 ; -11 7 = ; Sampling GRAB GRAB GRAB GARAB GRAB GRAB GRAB GRAB GRAB <u>s</u> & GRAB GRAB ş GRAB GRAB GRAB Ä GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER Sample Matrix Analysis Suite \$1: Suitate, Iron (brangerio Analysis) Sample Descriptio Eftera Efterna April orne - MSA/ISD Propion mediuly: stat/catato/Lactate Peld Standard Addition - QC REGIOC REG S ŝ E. S. å 86 ě. Ã REG REG REG RG REG REG 8 Anabytta Suite #1 Garman Screen Garman Spac ATT: Alkalinity 10005 10T000 100TO Z0CTDI 107700 1000 10T008 IQTO15 IQT016 10000 Q100G 010TO OT011 iQT012 10101 ROTO8 1GT013 AT5 AT3 AT4 ATe ¥ ATB

9AP Number: IMEBLECT-2002-00779

Dale: 11.04/2007 Plan Table Revision: 0.0 Plan Table Number: NITIAL_QRTLY

Project OU 1-07B ISB REMEDIAL ACTION GIN - NITTAL QUARTERLY (PM)

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Page 2 of 2

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Plan Table Number: NITIAL_SEM SAP Number. INFELEXT-2002-00779 Date: 11:04/2002

Plan Table Revision: 0.0

DRAFT

Project: OU 1-07B ISB REMEDIAL ACTION GW - INITIAL SEMANNUAL (PM)

Project Menager: NELSON L O.

SMO Contact KIRCHNER, D. R.

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Pen Lade Number: NYTAL, SEN SAP Number: INEEL/EXT-2002-00778 Dam: 116V/2002 Pen Take Revision: 0.0

F-2002-00779
Plan Techs Revision: 0.0 Project OU 1-078/198 PEDEDAL ACTION ON - NITAL SEMANHULAL (PM)

DRAFT

Project Manager: NELSON, L. O.

Sumpler: Carrol, R. E. SMO Contact: KIRCHNER, D. R.

Page 2 of 2

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Plan Table Number: INTTAL_ANNUAL. SAF Number: INEEL/OT-2022-00779 Date: 116042002 Pen Table Revention: 0.0 Project: OU 1-078 INS RESIDENAL ACTION GW-INITIAL ANNUAL (PM)

DRAFT

Sampler: Carrol, R. E. SAIO Contact: KIRCHNER, D. R.

Page 1 of

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Plan Table Revision: 0.0

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DRAFT Project OU 1-078 ISB REMEDIAL ACTION GW - NITIAL ANNUAL (PM)

Project Manager: NELSON, L. O.

Sample: Carrol, R.E. SMO Contact: KIRCHNER, D. R.

Page 2 of 2

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Project OU1-473 88 FEDREDAL ACTION OW - HETAL COLPLANCE - QUART PROJECT MANAGER. NELSON, L.O. DRAFT

Sample: Carrol, R. E.

ō T Page 4

Enter Analysis Types (AT) and Quantity Requested SMO Contact KIRCHNER, D. R. WA VE 31 242 NA NA 8 € TAN-30A (1012) TAN-28 (1008) Location 8 8 Sample Location MONITORING WELL MONITORING WELL FIELD BLANK Type of Location TAN TAN Area TAN = = = ~ Sampling Method Sol Ing GROUND WATER FBLX
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Plan Table Number: OPTIMIZ_MONTHLY SAP Number: INEEL/EXT-2002-00779 Orde: 11/04/2002

Plan Table Ravision; 0.0

Poject OU 1-078 ISB REMEDIAL ACTION GW - OPTIMIZATION MONTHLY (PM)

DRAFT

Project Menager: NELSON, 1. O.

SMO Contact. KIRCHNER, D. R. Sampler, Carroll R. E.

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Plan Table Number: OPTNAZ_MONTHLY S4P Number: INEELEXT-2002-00779 Oxfo: 11/04/2002 Plen Trible |

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Plen Trible Pewdeon: 6:0 Project: OU I-07B INS RENESON L COTTON GN - COTTON MONTHLY (PM) Project Nameger: NELISON, L.C.

Sumple: Carol, R. E. SMO Contact: KIRCHNER, D. R.

Page 2 of 2

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	63	Semple Description					Sample	Sample Location						Fler	Enter Analysis Types (AT) and Quantity Requested	Y) see (y	O P	uentity R	esante	,				_
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Plan Table Revision: 0.9 Plan Table Number: OPTIMIZ_QUARTER SAP Number: INEELEXT-2002-80779 Date: 11/11/2002

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Project OU 1-078 ISB REMEDIAL ACTION GWAL-OPTIAIZATION DURTRLY (PM)

Project Manager: NELSON, L.O.

SMO Contact KIRCHNER, D. R. Sempler: Carroll, R. E.

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Spit samples will be collected at all bootions for VOCs (TAL) and Ethere-Ethers, Methane analyses VOCs (TAL) - vtn// chicrica, itchicrostrens, intrachicrostress, cle.1.2-dchicrostress, and Enter Analysis Types (AT) and Quantity Requested CS EG ES FO RS R4 IN R8 R6 WA VE 7 Pield Teath - Analysis Sulls #1, aballnity, and COD -Tare-1,2-dichloroethene 2 The complete sample identification number (10 charactors) will appear on field guidence forms and sample labels. * 33 2.2 218 8 238 윷 253 857 240 310 222 375 233 8 ¥ ž 180 TAN-378 (1163) TAN-28 (1008) TAN-37C (1163) TSF-05A (71) TAN-26 (1118) TAN-30A (1012) TAN-37A (1163) TSF-058 (71) TAN-25 (1117) TAN-27 (1009) TAN-29 (1010) 7,844,31 (1219) TAN-10A (348) Contingencies TAN-D2 (339) ocation PMM-2 PWW-1 8 Sample Location VOCs (TAL) - MSALED MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WIELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL FIELD BLANK Type of Location VOCe (TAL) ATS: Tratum AT12 AT13: AT14: AT15 ATH? AT18: AT18: AT18 ş 至至 Ą TAN TAN. 1AN Ţ. TAN TAN TĀ. ž TAN. Ā AN Ä TAN The samping activity deplayed on this table represents the first six characters of the sample identification number, ¥. Planned Date Sampling GRAB gR/B GRAB GRAB G-PAB GRAB. 8 % GRAB GRAB GROUND WATER GRAB GRAB CROUND WATER FBLK GRAB GROUND WATER GRAB GROUND WATER GRAB à GROUND WATER GRAB GROUND WATER GRAB GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER Sample Description Anatysis Sulb #1: Sulfate, Iron (Inorganic Anatysis) Semple Propion star Buty rate/Apetate/Lactate Chane Ethene Methane - MSAVBD Reid Standard Addition - QC Chemical Oxygen Demand EtimeEthenethethane REG REGACC REG . Sample Type RSG ã 966 S. Anahais Sute #1 Š. ñ REG REG REG REG 8 8 RG 8 Gamma Screen MT2004 MT2002 MT2003 MT2006 MT2009 MTZ010 MTZ015 A710: Sr-90 Sampling Activity MT2000 100ZLM MTZ506 MT2007 MT2008 MTZ012 MTZ013 MTZ014 MT2015 MTZ034 Ë ATZ AT3 ¥Ĭ¥ ATS: ě. ğ. 14 Ě

Plan Table Number: OPTILIEE, GUISTTER SAP Number: NEEL/SST-5002-00779 Date: 1111/2007 Plan Table Ravison: 00 Project

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Sampler Carrol, R.E. SMO Contact KIRCHNER, D. R.

Page 2 of

A1 3A C6 EG E3 F8 R8 IN R8 R8 VA VE \$ € ₹ Location 8 Sample Location Type of Location INIP BLANK Avea Planned Date Coll Sampling Type Method JE. GROUND WATER Sample Description Sample Matrix Sample Type 8 Sampling Activity MTZ035

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ž,	Chemical Oxygen Demand	VOCE-(TRI)	Terra-1,2-dichlar ceftena
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ATS	Ethana/Ethana-MS/ASD		The County of th
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Plan Table Number: OFTIMZ_SEM

SVP Number: WEB_EST-2002-00779

Dabe: 97/192002 Pen Table Revision: 0.0 Project: OU 1-078/898/REMEDIALACTION ON-OFTAKCATION SELIE (PM)

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Project Manager: NELSON, L.O.

Sampler: Carrol, R. E. SMO Combact: KIRCHNER, D. R.

Page 1 of

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Page 2 or Sampling and Analyzis Plan Table for Chemical and Radiological Assiyais DRAFT Plan Table Humber: OPTMA2_SEM SAP Number: INSEL/ECT-2002-60779

Enter Analysis Types (AT) and Chariffy Requested SHO CONTACT KIRCHNER, D. R. Sampler, Curroll, R. E. **6** € ≥ Project Manager: NELSON, L.O. Location 8 Sample Location Poject OU 1-078 ISB REMEDIAL ACTION GW - OPTIMIZATION 95M (PM) Type of Location TRIP BLANK Acet ₹ Planned Date Coll Sampling Type Method 麗 Plan Table Revision: 0.0 GROUND WATER Sample Description Sample Matrix Semple Type 8 Date: 07/19/2002 OSM017 Sumpling Activity

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Sempling and Analysis Plan Table for Chemical and Restroingless Assetysis

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Date: 11112022
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DRAFT

Semples: Carrol, R. E. SMO Contact: KIRCHNER, D. R.

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MTZ026	REG	GROUND WATER	GRAB	+		TAN	MONITORNOME	TAN 920 (4103)	93	-†	-	-	~	4	\bot	\Box	+	-	-	~	4		_		П		
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	Ethane/Ethens/Mathana						AT14: VOCs (TAL) - MSMASD					14			1		Carl Laste Andreas Colombia at the Colombia	- 8		١	1			П		Ш	
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Plen Table Number: CPTIMEZ ANNIAN, SAP Number: INEELECT:2002-00779 Date: 11/11/2002 Plan Table Revision: 0.0 Project: OU 1-078 (S)

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Plan Table Revision: 0.0 Project OU 1-078 ISS REMEDIAL ACTION GAMA - OPTIMEATION ANNUAL (PM) Project Learnage: NELSON, L.O.

Sumples: Curol, R. E. SAVO Contact: KIRCHNER, D. R.

Page 2 of 2

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Ę	Akalinty	ATII: 9-80	Comments:
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Í	Chambrai Churan Deseard	habert 1	hans-1,2-dichloraribave
ž		AT13: VOCA (TAL)	
¥I¥	Efternöfterschlieber	WSWSD	Pad Texts - Ambraia Sulfa M. Life abox COO
ATS	EthanoEhonoAlethan - MSARSD		
ATE	E. Field Standard Addition - CC		Spill samples will be culiabled at all locations for VOCs (TAL) and Etrans/Etrans/Alethane unalyses
Ë	Genma Screen	4440	
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\$	Analysis Sulle #1: Anmonia Mingen, Phosphine, Sullain, fron (Inoganic Analysis)	Security Control of the Control of t	
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8 Page SMO Contact: KIRCHNER, D. R. Sampler Carol, R. E. **\$ \$** € £ Poject Manager: NELSON, L.O. Sampong and Analysis Plan Table for Chemical and Radiological Analysis. DRAFT Location PMM-1 PMM-2 8 8 Sample Location MONTORING WELL MONTOPRING WELL FIELD BLANK TRIP BLANK Polect OPTIMIZATION - COMPLIANCE MONTORING - OUARTERLY Type of Location TAN ¥ 1Ak Arma ¥ Planned Date : ; : 11 ₹ 8 GRAB PBLK Plan Table Revision: 0.0 GROUND WATER GROUND WATER GROUND WATER Plen Table Number: OPT_COMP[JANCE] Sample Description Sampie Martic REGIO REG Sample Type 8 8 Date: 07/18/2002 SAP Number: OCINDO OCMD01 OCM002

		Somments:	VOCs (TAL) - vmy chande, transcretters, intractions are 13 4-as	time-1,2-dchloroethene										
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Page 1 of

Plan Table Hamble: LTERAL CLARKTER

SAP Namber: INEEL/SCT.2002-0073

One: 1111/0202 Plan Table Revision: 60 Project: OV 1-078 SB RENEDAL ACTION GAIN-LONG TERM CLARITERLY (PM) Project Manage: NESSON, L.O.

Sample: Carrol, R. E. SMO Contact: K/RCHNER, D. R.

		Sample Description					Sample Locator	озфол		L.					5	(ark)	분	1 % 82	and Qu	Enter Analysis Types (AT) and Quantity Requested) Age	,				
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UTO2019	REG	GROUND WATER	GRAB		11	TAN	MONITORING WELL	T3F-05A (71)	ñ	-	-	-	2		-	┪	+	-	~	L	⊢	ļ				
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LT0020	REG	GROUND WATER	GRAB		11	TAN	MONITORING WELL	TAN-27 (1009)	502	-	-	+	21			\vdash	-	<u> ~</u>	~	\perp	\vdash	L	L		t	7
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LT0022	REG	GROUND WATER	GRAB		11	TAN	MONITORING WELL	TAN-29 (1010)	22	-	-	+	~			-		-	~	\vdash	-		Ľ.		t	$\overline{}$
LT0023	REG	GROUND WATER	GRAB		11	TAN	MONITORING WELL	TAN-30A (1012)	310	-	-	-	2	匚	Γ	\vdash	1	-	Γ	~	-		ļ		T	т-
110024	REG	GROUND WATER	GRAB		11	TAN	MONITORING WELL	TAN-31 (1299)	258	-	-	-	7		-	H	-	-	~	\vdash	\vdash		L	L	t	
LTG625	REC	GROUND WATER	GRAB		111	TAN	MONITORING WELL	TAN-37A (1163)	240	-	-	-	-			\vdash	-	F	~	\vdash					+	
F10036	REG	CROUND WATER	GRAB		111	TAN	MONITORING WELL	TAN-378 (1163)	212	-	-	-	2			╁	-	-	7	\vdash		ļ.,			t	
LTQ027	REG	GROUND WATER	GRAB		11	TAN	MONITORING WELL	TAN-37C (1163)	376	-	-	+-	2		Ι	\vdash	-	-	2	\vdash	╀	L	L	Γ	+-	
LTQU26	REG	GROUND WATER	GRAB		111	TAN	MONITORING WELL	TAN-10A (348)	233	-	-	-	~	۳		\vdash	-	-	7	H	ļ	L			+	
LTQ029	REG	GROUND WATER	GRAB		1.1	TAN	MONITORING WELL	TAN-D2 (339)	241	-	-	Ė	~			H	 -	-	~		L	L			 	
-T0030	REG	GROUND WATER	GRAB			TAN	MONITORING WELL	PMM-1	180	-	-	Ė	24		Г	┢	-	<u> </u> -	2	\vdash	L	L			┢	
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	Charefferrestens agency	Company			!		ATI4:					El I		FIRE LINES - Analysis State #1, Brainly, and COO	# E		Ž.	ž.	8							
	Fleid Standard Addition - CC	Só.					A115:					81 	į	19	8 8	Se de	al loca	fors fo	r VOCs	Spill namples will be collected at all locations for VOCs (TAL) and Ethero-Ethene-Methans analyzes	EFE	£ E	4	8	90	
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Plan Table Number: LTERM_COLARTER
SAP Number: INTEL/EXT-2002-40778

Date: 1971/2002 Plan Table Revision: 0.0

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Sampling Activity LT0033

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Project OU : 477 ISS RENEDAL, ACTION CANA . LONG TERN QUARTIERLY (PM) Project Manager . NELSON, L.O.

SAND Comment KIRCHWER, D. R.

Page 2 of

£ € ₹ Location 8 Sample Location Type of Location TRIP ELANK Age 1 Parmed Date • Sampling Lifethool Coll Type GROUND WATER Sample Description Sample Math

of bentification number (10 characters) sell appear on feld guidence forms and sample labels	VCA(IA) WAS (IA) Ems. (2-determines metallicontres, de 12-determines moi	Field Tests - Arabida Sille at detailer, and COO	Spill stamples will be collected at a location for VOCs (TAL) and Phone Spinness and some				Confryancies			
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Project Manager: NELSON, L.O.

Switcher Carrol, R. E. SAO Contact: KIRCHNER, D. R.

Page 1 of 2

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Plan Table Number: LTERM_SEM 3AP Number: INEEJEXT-2002-50779

Date: 11/11/2002

Semple Type

Sumpling Activity LT8050

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Enter Analysis Types (AT) and Quantity Requested SMO Contact: KIRCHNER, D. R. Sampler, Carroll, R. E. **6** ≨ Project Manager: NELBON, L.O. Location 8 Sample Location Project OU 1-07BISB REMEDIAL ACTION GW - LONG TERM SEM (PM) TRIP BLANK Type of Location 7,00 ≩ Planned Ξ Cot Sampling Type Method TBLK Plan Table Ravision, 0,0 GROUND WATER Sample Cast to

The complete sample identification number (10 characters) will appear on faid guidance forms and sample selections.	AT11; Tribum	ATIZ VOCA (TAL)	AT13: VOCs (TAL) - MSAABD	ATH	AT15:	ATT6:	AT17:	A718:	ATI	AT20:	Confingencies	
The sampling activity displayed on the table represents the first six characters of the sample identification number. ATT: Attabates	AT2 Analysis Saling A		At Ethen Chen Address	ATE Character with the same same	ATB: Field Standard Addition - CC	ATP: Comma Screen	ATR: Ganteas Spec	AT9: Propionalis/Sullymbu/Lookshin/Lachite	ATIG. SH-40	Analysis Saling	Analysis Salle #1: Antmonia Mitrogen, Phospit ale, Suitale, Iron (Norganio, Analysis)	

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Plan Table Revision: 0.0

Date: 11/11/2002

Plan Table Mumber: LTERM_AMNUAL SAP Number: INEEL/EXT-2002-00778

DRAFT Project OU 1-078 ISB REMEDIAL ACTION GWAY-LONG TERM ANNUAL (PM)

Project Manager: NELSON, L. O.

SND Contact: KIRCHNER, D. R.

Sampler: Carroll, R. E.

AT! AT2 AT3 AT4 AT5 AT6 AT7 AT8 AT9 AT10 AT10 AT11 AT13AT14AT15AT18AT18AT7 Enter Analysis Types (AT) and Quantity Requestix 1N RB R6 VA VE ~ A1 34 GS E0 E3 F8 R8 R4 Q4 1 2 1 1 1 1 2 7 7 338 230 218 38 ž 340 310 2 358 340 272 375 22 7 1 180 ¥ TAN-378 (1163) TBF-05A (71) TSF-058 (71) TAN-28 (1115) TAN-27 (1009) TAN-25 (1117) TAN-30A (1012) TAN-37A (1163) TAN-37C (1163) TAN-28 (1008) TAN-29 (1010) IAN-31 (1219) TAN-10A (348) TAN-02 (339) Location PMM-2 PMM-8 Sample Location MONITORING WELL MONITORING WELL MONITORNG WELL MONITORING WELL MONITORING WELL MONITORING WELL THEM. SMINOLINGW MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL MONITORING WELL HELD BLANK Ī ₹ 3 ₹ TAR ₹ Ā TAN. TAN TAN TAN ¥ TAN TAN ¥. TAN TAN ĭ ¥ Plenned Date : 1 11 , : ,, 11 11 . 1 -~ 7 --Sampling GRAB GRAB GRAB B GRAB 68. 88. a B GRAB GRAB GPAB ₹8 GRAB GRAB. GRAB GRAB GROUND WATER GRAB FBLK GROUND WATER GRAB GROUND WATER GRAB GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER GROUND WATER Sample WATER REGOOD Sample Type 8 EG. REG Æ REG REG REG REG REG REG Æ REG SEG. ÆG PEG. 8 LTA018 LTA018 LTAO19 LTA021 LTA029 Sampling Activity LTA017 LTA022 LTA023 LTA024 LTA02B LTA020 LTA025 LTA026 LTA027 LTA030 LTA031 LTA032

Soil samples wit he collected at all locations for VOCs (TAL) and Ethan-Ethern-Kelhane analyses VOCs (TAL) - Viryl chlaride, Trickshallene, Strachlarcethene, de 12-dichlarcethene, and Field Tests - Analysis Suits #1, sécalady, COO trans-1,2-dichlorosthene The complete sample identification number (10 characturs) will appear on find guodence forms and earnole labola VOCs (TAL) - MS/M3D VOCe (TAL) AT15 95-00 AT13 AT1∉ AT12 AT15 ATIE ATIR AT 198 AT17: The sampling existing displayed on this table represents the first aix chieracuse of the sample identification number. Analysis Sulla et : Ammonia Nétropen, Phosphata, Sulfata, Inn (Inorganic Analysis) Propionala Buty ata/Acetata/, actate Ethans/Ethans/Methans - MSMS) Field Standard Addition - QC Chemical Oxygen Demand Ethane/Ethane/Methane Analysis Suits #1 **Септла Spec** Gross Alpha Akman A716 Ę AT2 2 Ä Ë Ë

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Page 2 of 2

Project OU 1-078 ISB REMEDIAL ACTION GAMA-LONG TERM ANNUAL (PM)

Plan Table Revision: 0.0

Plan Table Number: LTERIA_ANNUAL
SAP Number: IMEEUEXT-2002-00779
Date: 11/11/2002 Plan Table Revi

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Project Manager: NELSON, L.O.

SN/O Contact KIRCHNER, D. R. Sampler: Cerroll R. E.

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Arabicis Sults #1 Chemical Oxygen Denund ATI2: VOCA (TAL)	
Chemical Organ Denand ATIS: VOCA (TAL)	VOCs (TAL) - vityl chloride, trichkroefhene, tetrachloresthene, de-1,2-dichkroeftene, and
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ATI: Ehane/Ehane/Mehane	Field Tests - Analysis Suite #1, ethalisty, COD
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ATP. Garma Street	
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Appendix D OU 1-07B ISB Monitoring Well Information

Information for Appendix D will be supplied at a later date.